Henry G. Burnett (HB 3273) Sarah E. O'Connell (SO 0928) Fulbright & Jaworski L.L.P. 666 Fifth Avenue New York, New York 10103 Telephone: (212) 318-3000

Facsimile: (212) 318-3400

Attorneys for Plaintiff AT&T Corp.

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

AT&T CORP.,

Plaintiff,

-against- : 07 CV 6544 (LAK)

NIGERIAN TELECOMMUNICATIONS, : MOTION FOR

PLC, : <u>DEFAULT JUDGMENT</u>

*Defendant.* : ------x

PLEASE TAKE NOTICE that, pursuant to Rule 55(b)(1) of the Federal Rules of Civil Procedure and Rule 55.2(b) of the Local Civil Rules for the Southern District of New York, and upon the annexed Affidavit of Henry G. Burnett in Support of Application to Court for Judgment Upon Default, sworn to January 18, 2008, with exhibits annexed thereto, the Affidavit of Suzanne L. Montgomery in Support of Motion for Entry of Default Judgment, sworn to January 16, 2008, with exhibits annexed thereto, the Affidavit of Dorian LaForce in Support of Assessment of Damages Upon Entry of Default, sworn to January 18, 2008, with exhibits annexed thereto, plaintiff AT&T Corp. ("AT&T"), will move this Court, before the Honorable Lewis A. Kaplan, District Judge of the United States District Court for the Southern District of New York, at the Courthouse located at 500 Pearl Street, Courtroom 12D, New York, New York, for entry of the Order and Judgment of Default in the above-captioned action, submitted

herewith, that will constitute a default judgment as against defendant Nigerian Telecommunications, PLC, and any further relief the Court deems just and proper.

Dated: January 18, 2008 New York, New York FULBRIGHT & JAWORSKI L.L.P.

By:

Henry G. Burnett (HB 3273) Sarah E. O'Connell (SO 0928) 666 Fifth Avenue, 31<sup>st</sup> Floor New York, New York 10103 Telephone: (212) 318-3000

Telephone: (212) 318-3000 Fax: (212) 318-3400

E-mail: hburnett@fulbright.com

soconnell@fulbright.com

-and-

Of Counsel:

Suzanne L. Montgomery, Esq. One AT&T Way, Room 3A219 Bedminster, New Jersey 07921 Telephone: (908) 234-5695 Fax.: (832) 213-0359 E-mail: sm6526@att.com

Attorneys for Plaintiff AT&T Corp.

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